

October 26, 2017

Mr. Brian Ferebee
Regional Forester
U.S. Forest Service
1617 Cole Boulevard, Building 17
Lakewood, CO 80401

Re: Species of Conservation Concern

Dear R2 Regional Forester Ferebee:

The U.S. Forest Service (USFS) and bighorn sheep advocates have a shared interest in providing for persistence of wild sheep on the National Forests. Like elk and other important big game animals, bighorn sheep are integral to the National Forest System. Federal laws and Congressional Acts make conservation of bighorn sheep and their habitat on USFS lands a clear responsibility of the USFS.

We are encouraged by direction in the 2012 USFS planning rule for extensive engagement with the public in development and revision of forest plans (FSH 1909.12, chapter 40, sec. 42), including the evaluation and selection process for Species of Conservation Concern (SCC). We, the undersigned conservationists, seek active engagement in the next steps toward our mutual interest in both the assessment and selection of SCC and development of forest plan components that contribute to bighorn sheep viability on National Forests across the western U.S.

We would like to hold an organizational phone call with appropriate USFS Washington Office and Regional staff to coordinate and collaborate across USFS Regions. This needs to happen to initiate the missing collaboration directed in the 2012 Planning Rule. We also request that you provide us with an up-to-date revision schedule for forest plans that are within historic range of bighorn sheep. We ask those National Forests, either in or soon-to-be in revision, obtain our input and involvement in the planning process as it applies to bighorn sheep. Importantly, this engagement includes developing SCC lists in advance of revision.

Both USFS 2012 Planning Rule direction and repeated Congressional appropriations language require stakeholder inclusion in these discussions. We recognize that responsibility for selection and final approval of SCC rests with each Regional Forester. We also appreciate your recognition of, and personal commitments to, the necessity for collaboration in this process both within and among Regions. We request that Regional Foresters and their staffs: actively engage with bighorn sheep constituents; consistently utilize the best available science across Regions; appropriately evaluate, in some cases re-

evaluate, whether or not there is substantial concern over bighorn sheep long-term persistence in the respective planning areas.

We are feeling a sense of urgency as it appears that many National Forests are actively and independently working on SCC evaluation and selection. Information gleaned to date from USFS websites heightens our concern that bighorns are not being adequately considered. Where we have been able to find explicit rationale for not including bighorn sheep as SCC, that rationale appears unfounded and does not appear to be based on the best available science. We feel this erroneously minimizes concern over the security and persistence of bighorn sheep populations.

Bighorn sheep have been designated as a USFS Sensitive Species in Regions 1-5 and portions of Region 6. The facts and science that support Sensitive Species designation have not changed. Those same facts and the best available science reinforce the need to designate bighorn sheep as SCC on many forests. Failure to do so would be contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12).

Historically, bighorn sheep were well-distributed across the western United States (U.S.), numbering up to an estimated 2 million animals. Habitat loss, unregulated market hunting and disease resulted in extirpation of most U.S. populations. Efforts to re-establish populations have been ongoing since the early 1900s, with more than 22,000 bighorn sheep being transplanted in over 1,500 separate transplant actions.

Despite these efforts, die-offs continue. The status of the species remains tenuous, with fewer than 60,000 currently in the western U.S., often occurring in small, isolated herds. It has been well-established in the scientific literature that bacteria transmitted from domestic sheep results in pneumonia-related all age die-offs within bighorn populations, followed by long-term suppression of lamb recruitment. These events are not uncommon.

All 14 public-land grazing states with bighorn sheep have experienced at least one bighorn sheep respiratory disease die-off in the last 14 years, and most have had numerous events. According to data compiled by the Western Association of Fish and Wildlife Agencies Wild Sheep Working Group (WAFWA WSWG), a total of 13,391 animals have been lost to these events since 1980. In addition, WAFWA WSWG estimates that as a result of these respiratory disease events, nearly 11,000 lambs born to surviving ewes died of pneumonia within a few months. The initial loss of adult animals is significant. However, it is ongoing depressed lamb recruitment in the years following respiratory disease events that impedes herd recovery and threatens persistence.

Areas managed by the USFS have historically provided ecological conditions essential to the persistence of native bighorn sheep. However, ongoing presence of domestic sheep on and adjacent to bighorn sheep habitat is a stressor that impairs NFS lands from providing the ecological conditions that bighorn sheep require. Based on strong scientific evidence, we believe there is substantial concern for the persistence of bighorn sheep over the long term. Consistent with stated USFS direction for selection of SCC, bighorn sheep meet the criteria for identifying species of conservation concern (FSH 1909.12 Chapter 10, 12.52c).

A timely response addressing our requests will be much appreciated.

Sincerely,

Wild Sheep Foundation

and

WSF Chapters

Alaska Wild Sheep Foundation
California Wild Sheep Foundation
Eastern Chapter Wild Sheep Foundation
Idaho Wild Sheep Foundation
Iowa Foundation for N.A. Wild Sheep
Midwest Chapter Wild Sheep Foundation
New Mexico Wild Sheep Foundation
Oregon Foundation for N.A. Wild Sheep
Utah Foundation for N.A. Wild Sheep
Washington Wild Sheep Foundation
Wyoming Wild Sheep Foundation

WSF Affiliates

Arizona Desert Bighorn Sheep Society
Elko Bighorns Unlimited
Fallon Chapter Nevada Bighorns Unlimited
Fraternity of the Desert Bighorn
Nevada Bighorns Unlimited – Midas
Nevada Bighorns Unlimited – Reno
Rocky Mountain Bighorn Society
Bear Trust International
Northern Nevada Chapter Safari Club International

National Wildlife Federation

and

NWF Chapters

Arizona Wildlife Federation
Colorado Wildlife Federation
Idaho Wildlife Federation
Montana Wildlife Federation
Nebraska Wildlife Federation
New Mexico Wildlife Federation
North Dakota Wildlife Federation
South Dakota Wildlife Federation
Association of NW Steelheaders
Conservation Northwest

Backcountry Hunters & Anglers

and

BHA Chapters

Alaska Backcountry Hunters & Anglers
Alberta Backcountry Hunters & Anglers
Arizona Backcountry Hunters & Anglers
B. Columbia Backcountry Hunters & Anglers
California Backcountry Hunters & Anglers
Colorado Backcountry Hunters & Anglers
Idaho Backcountry Hunters & Anglers
Montana Backcountry Hunters & Anglers
Nevada Backcountry Hunters & Anglers
New Mexico Backcountry Hunters & Anglers
Oregon Backcountry Hunters & Anglers
Utah Backcountry Hunters & Anglers
Washington Backcountry Hunters & Anglers
Wyoming Backcountry Hunters & Anglers